Honorable John C. Coughenour 1 Honorable Richard A. Jones 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 UNITED STATES OF AMERICA, CASE NO. CR20-092JCC 10 Plaintiff, 11 NOTICE OF RELATED CASES v. 12 ALAN GOMEZ-MARENTES, et al., 13 14 Defendants. 15 UNITED STATES OF AMERICA, NO. CR20-217JCC 16 Plaintiff, 17 NOTICE OF RELATED CASES v. 18 CESAR VALDEZ-SANUDO, et al., 19 Defendant. 20 UNITED STATES OF AMERICA, NO. CR20-091RAJ 21 Plaintiff, 22 NOTICE OF RELATED CASES v. 23 EDGAR LUNA-GARCIA, 24 Defendant. 25 26 Comes now the United States of America, by Tessa M. Gorman, Acting United 27 States Attorney for the Western District of Washington, and Amy Jaquette, Assistant 28 UNITED STATES ATTORNEY

NOTICE OF RELATED CASES

United States v. ALAN GOMEZ-MARENTES, et al., CR20-092JCC United States v. CESAR VALDEZ-SANUDO, et al., CR20-217JCC United States v. EDGAR LUNA-GARCIA, et al., CR20-91RAJ – 1

700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 TEL: 206-553-7970

United States Attorney for said District, and respectfully submits the following Notice of Related Cases pursuant to Local Criminal Rule 13(a) and (b). The three cases captioned above are related cases.

On July 23, 2020, the Grand Jury charged 19 members of a large drug trafficking organization (DTO) with one count of Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 1), and charged a subset of those individuals with one count of Possession with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 2), among other crimes. (CR20-092JCC, Dkt. 1.) On this same date, the Grand Jury charged Edgar LUNA-GARCIA in a separate indictment with one count of Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 1) and one count of Possession with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 2). (CR20-091RAJ, Dkt. 1.) The same facts formulate the basis of Counts 1 and 2 in both case CR20-092JCC and CR20-091RAJ. On July 28, 2020, agents arrested many of the indicted defendants during a coordinated takedown of the investigation. LUNA-GARCIA was not arrested, as his whereabouts were unknown until recently. On August 7, 2020, the grand jury returned a Superseding Indictment charging a number of substantive counts and one additional defendant. (CR20-092JCC, Dkt. 152.)

This takedown was the culmination of more than a year of investigation into a drug trafficking organization (DTO) distributing multi-kilo quantities of narcotics in Western Washington. The investigation was led by the Drug Enforcement Administration, in partnership with Homeland Security Investigations, the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and the Federal Bureau of Investigation. The investigation began in January 2019 and involved numerous periods of court-

27

25

26

authorized wiretaps, controlled purchases of drugs using confidential sources, and hundreds of hours in physical and electronic surveillance.

At the time of the takedown in CR20-092 JCC, investigators elected to hold off on indicting (or arresting) a subset of the targets of the investigation – specifically, Cesar VALDEZ-SANUDO and his criminal associates. Rather, agents continued to investigate this group of individuals and received court-authorization to conduct additional wiretaps.

On December 9, 2020, the Grand Jury returned an Indictment charging this subset of the larger investigation in a separate conspiracy. This Indictment charged 11 members of a drug trafficking organization (DTO) with one count of Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 1), and two of those individuals in a related count of Conspiracy to Commit Money Laundering (Count 3), in violation of Title 18, United States Code, Section 1956. (CR20-217JCC, Dkt. 1.)¹ On December 16, 2020, agents arrested the 11 indicted defendants during a coordinated takedown of the investigation.

On March 8, 2021, the Court held an initial appearance for Edgar LUNA-GARCIA after his arrest on the indictment in CR20-091RAJ.

All three of these cases are related, as they rely in large part on the same wiretap pleadings, involve common co-conspirators, and contain instances of overlapping surveillance. Due the overlap between the three cases, the United States files this notice of related cases and requests that all three cases be assigned to the same judge. As noted above, Counts 1 and 2 against LUNA-GARCIA arise from the same facts as Counts 1 and 2 in CR20-092JCC. As a result, the United States intends to supersede the indictment in CR20-092JCC to add LUNA-GARCIA as a defendant. Although the United States does not intend to seek to join CR20-217JCC with CR20-091RAJ and CR20-092JCC for trial, it does seek to litigate any challenges to the underlying

¹ This case was originally assigned to the Honorable Richard A. Jones; the Court reassigned the case to the Honorable John C. Coughenour after the United States filed a Notice of Related cases.

investigation – which will necessarily rely on common issues of law and fact – before the
same Court.
DATED this 16th day of March, 2021.
Respectfully submitted,
TESSA M. GORMAN
Acting United States Attorney
/s/ Amy Jaquette
AMY JAQUETTE
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-2636
E-mail: amy.jaquette@usdoj.gov

United States v. ALAN GOMEZ-MARENTES, et al., CR20-092JCC United States v. CESAR VALDEZ-SANUDO, et al., CR20-217JCC United States v. EDGAR LUNA-GARCIA, et al., CR20-91RAJ – 4

UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 TEL: 206-553-7970